



MISSOURI ETHICS COMMISSION

P.O. Box 1254

Jefferson City, MO 65102

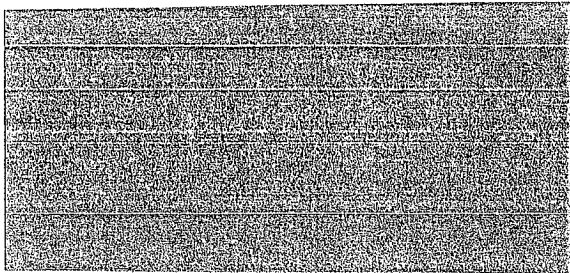
[www.mec.mo.gov](http://www.mec.mo.gov)

(573) 751-2020 / (800) 392-8660

Julie A. Allen

Executive Director

March 11, 2011



Opinion No. 2011.03.CF.002

Dear [REDACTED]

At the March 8, 2011 meeting of the Missouri Ethics Commission, your request for an opinion was discussed. The following is the Commission's response to your questions:

*Question 1: Is the Commission's interpretation of 130.031, RSMo, that foreign corporations, holding a certificate of authority from the Missouri Secretary of State, may contribute to a "political action committee" (PAC) as defined in subsection 22 of section 130.011, RSMo?*

*Question 2: If the answer to Question 1 is yes, then what evidence is necessary for the PAC to demonstrate that the foreign corporation properly holds a certificate of authority? Is a copy of the current annual report demonstrating that the foreign corporation is in good standing that is available on the Secretary of State's website sufficient?*

You may be guided by MEC Opinion No. 2010.08.CF 004, stating that PACs can receive contributions from foreign corporations holding valid certificates of authority. §351.582, RSMo., provides for the effect of a valid certificate of authority issued by the Missouri Secretary of State. The PAC may use whatever evidence is available from the Secretary of State to ensure a foreign corporation holds a valid certificate of authority.

Sincerely,

A handwritten signature in cursive script, reading "Julie A. Allen", is written over the printed name.

Julie A. Allen, CPA, PMP  
Executive Director